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**MEMO ENDORSED**

February 26, 2008

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Via Fax - (212) 805-7949  
Hon. P. Kevin Castel  
United States District Judge  
United States Courthouse  
500 Pearl St., Room 2260  
New York, NY 10007

**Re: Transglobe Shipping Co. Ltd. v. Natural Resources Pte. Ltd.**  
**Docket No. 07 Civ. 8158 (PKC)**  
**United States District Court, Southern District of New York**

Dear Hon. Judge Castel:

We represent the Plaintiff, Transglobe Shipping Co. Ltd., in the above referenced lawsuit. We write to the Court in connection with Plaintiff's application to amend its Verified Complaint and the Ex Parte Order of Maritime Attachment to include two additional defendants, Energy Trading Company Pvt. Ltd. and Wellman Singapore Pte. Ltd. Plaintiff's amended complaint and ex parte order were hand delivered to your Honor's chambers this afternoon.

On September 18, 2007 your Honor issued an Ex Parte Order for the issuance of a process of maritime attachment and garnishment against the property of the Defendant in an amount of \$770,052.19. Plaintiff has served the process of maritime attachment along with the Court's Order on various garnishees. Plaintiff has to date restrained Defendant's property at the Bank of New York in the amount of only \$1,450.00, which is far short of its claim of \$770,052.19 authorized by the Order. As a result Plaintiff engaged a company in the United Kingdom to investigate whether the Defendant, Natural Resources Pte. Ltd. was still in business, and, if so, whether it may be using other corporate entities to conduct its business. Plaintiff obtained the investigator's report last week which indicates that Plaintiff is directly related to Energy Trading and Wellman Singapore. Plaintiff also suspects that Defendant may be arranging all of its transactions to go under these names, and thereby circumventing the order of the Court. If Plaintiff is not permitted to file an Amended Verified Complaint to include Energy Trading and Wellman Singapore, it will be prevented from fully securing its claims against the Defendant. In the circumstances, we respectfully request your Honor grant Plaintiff's application to amend its complaint to include the two additional defendants.

We very much appreciate the Court's consideration of this request. We are available to discuss the matter at any time convenient to the Court.

Respectfully submitted,

LAW OFFICES OF RAHUL WANCHOO

*Rahul Wanchoo*  
Rahul Wanchoo (RW-8725)

*I will grant the  
applicant's motion to  
an attachment before  
June 6, 2008  
ORDERED  
USBJ  
2-26-08*